

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ELMER CAMPBELL, ET AL.)	Case No. C-1-01-527
)	
Plaintiff,)	
)	
v.)	
)	
INTERNATIONAL PAPER COMPANY,)	
SUN CAPITAL PARTNERS, INC.)	
SMART PAPERS)	
)	
Defendants)	

MOTION FOR ORDER ALLOWING JONATHAN P. HARMON
TO APPEAR *PRO HAC VICE* ON BEHALF OF DEFENDANTS

Michael A. Roberts, attorney for defendant International Paper Company, hereby moves this Court for an order granting Jonathan P. Harmon, Esq. leave to appear in this matter *pro hac vice* and states as follows:

1. Jonathan P. Harmon, Esq. was admitted to the Virginia State Bar in October 1995. He is also admitted to practice in the following courts:

<u>Courts</u>	<u>Date Admitted</u>
U.S. District Court, E.D. Virginia	January 30, 1995
Supreme Court of Virginia	October 30, 1995
U.S. Court of Appeals, Fourth Circuit	February 10, 1998
U.S. District Court, W.D. Virginia	June 18, 1998
U.S. District Court, E.D. Texas	October 15, 1998
U.S. District Court, N.D. Texas	December 16, 1998

He is in good standing and eligible to practice in all of said courts. A current certificate of good standing by the U.S. District Court for the Eastern District of Virginia is attached.

2. Jonathan P. Harmon, Esq. is a Partner in the law firm of McGuireWoods LLP.

3. In order to adequately represent the Defendant, Defendant will, from time to time, rely on Jonathan P. Harmon, Esq. to make certain court appearances before this Court.

4. A Declaration of Jonathan P. Harmon, Esq. is attached hereto and submitted in support of this motion.

Therefore, the defendant requests that Jonathan P. Harmon, Esq. be entitled to appear in this action *pro hac vice*.

Respectfully submitted,

OF COUNSEL:

GRAYDON, HEAD & RITCHEY LLP
1900 Fifth Third Center
P.O. Box 6464
Cincinnati, Ohio 45201
(513) 621-6464

/s Michael A. Roberts
Michael A. Roberts (0047129)
Graydon Head & Ritchey LLP
1900 Fifth Third Center
P.O. Box 6464
Cincinnati, Ohio 45201
(513) 621-6464
(513) 651-3836
email:mroberts@graydon.com

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of January, 2004, a true and correct copy of the foregoing was sent via facsimile and U.S. mail, postage prepaid, to: Randolph H. Freking, Esquire, Freking & Betz, 214 East Ninth Street, 5th Floor, Cincinnati, Ohio 45202.

/s Michael A. Roberts